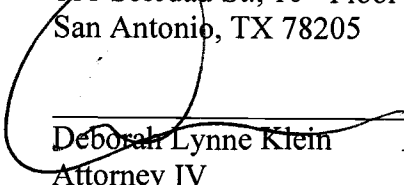


2. Pursuant to 28 U.S.C. § 1446(a), attached to this Notice of Removal are copies of all process and pleadings served upon Defendant in the removed case. (See Exhibit A)
3. This Notice of Removal is timely under 28 U.S.C. § 1446(b) because the removal is filed within thirty (30) days after Defendant first received a copy of a paper from which it could first be ascertained that the case is one which is or has become removable.
4. The claims asserted against Defendant are civil actions in which this court has original jurisdiction under the provisions of 28 U.S.C. § 1331 and 28 U.S.C. § 1441(b). Plaintiff's claims arise under the laws of the United States. Specifically, Plaintiff alleges causes of action pursuant to the Fourteenth Amendment to the U.S. Constitution and of 42 U.S.C. § 1983.
5. Venue is proper in this district under 28 U.S.C. § 1446(a), because Bexar County, where the removed action has been pending, is encompassed by the United States District Court for the Western District of Texas, San Antonio, Division.
6. To the extent Plaintiff is asserting various state law causes of action, Defendant would show that the United States District Court has jurisdiction over Plaintiff's pendent state law claims, pursuant to the Court's supplemental jurisdiction because those claims arise out of and are derived from a common nucleus of operative facts which form the basis of Plaintiff's federal civil claims.
7. Defendant further submits that it will pay all costs and debts incurred in the removal proceeding, should the court determine that this action is not removable or is improperly removed.
8. Pursuant to 28 U.S.C. § 1446(d), Defendant intends to serve written notices of this removal upon all interested parties and upon the State Court, promptly after filing this Notice of Removal.

WHEREFORE, the City of San Antonio, Defendant in this action, pursuant to these statutes and in conformance with the requirements set forth in 28 U.S.C.A. §1446, removes this action from the 408th Judicial District Court of Bexar County, Texas to this Court, and for such further relief to which Defendant is justly entitled.

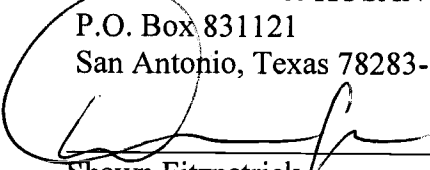
Respectfully Submitted,

CITY OF SAN ANTONIO
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Attorneys for CITY OF SAN ANTONIO

CERTIFICATE OF SERVICE

This is to certify that on the 19th day of September 2011, a true and correct copy of the foregoing instrument has been served upon the below named individuals via Certified Mail, Return Receipt Requested:

Javier N. Maldonado
Law Office of Javier N. Maldonado, PC
110 Broadway, Suite 510
San Antonio, Texas 78205

Juan M. Gonzales
Gonzales & Otero LLC
110 Broadway, Suite 510
San Antonio, Texas 78205


DEBORAH LYNNE KLEIN